

## REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: July 24, 2015

ANALYST: Sarah Juris

## I. COMMITTEE:

Put Alaska First  
C00544346  
Jim Lottsfeldt, Treasurer  
P.O. Box 92021  
Anchorage, AK 99509

## II. RELEVANT STATUTE:

52 U.S.C. § 30104(b)(2)  
11 CFR § 104.3(a)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Put Alaska First ("the Committee") amended its 2014 12 Day Pre-Primary Report to disclose additional receipts of \$440,000.00, which were not disclosed on the original report (Attachment 2).

On August 8, 2014, the Committee filed the original 2014 12 Day Pre-Primary Report covering the period from July 1, 2014 through July 30, 2014. The report disclosed \$667,500.00 in receipts on Line 11(c) (Contributions from Other Political Committees) of the Detailed Summary Page (Image 14950002415).

On January 26, 2015, the Committee filed an Amended 2014 12 Day Pre-Primary Report. The report disclosed \$1,107,500.00 in receipts on Line 11(c) of the Detailed Summary Page, an increase in receipts of \$440,000.00 from the original report (Image 15970048548).

On March 29, 2015, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2014 12 Day Pre-Primary Report, received January 26, 2015. The RAFI requested clarification regarding the substantial increase in receipts

disclosed on the amended report that were not disclosed in the original filing (Image 15330079477).

On April 28, 2015, the Committee filed a Miscellaneous Electronic Submission ("Form 99") in response to the RFAI. The Form 99 stated:

"This is in response to your letter dated March 29, 2015 concerning 12 Day Pre Primary Report (7/1/14-7/30/14) of Put. Alaska First (the "Committee"). You have asked about an increase in receipts from the original report. The increase in receipts is due to only one contribution that was received on July 30, 2014. The Committee initially believed the contribution was received after the close of books for the Pre-Primary report period, but later ascertained that it was received within the coverage period for that report. It got lost between the periods. The Committee takes its filing obligations seriously and has put procedures into place to ensure that all contributions will be disclosed timely in the future. We hope that this information adequately answers your question. If you have any additional questions, please feel free to contact the Committee" (Image 15951231722).

On May 6, 2015, the Reports Analysis Division (RAD) Analyst spoke with Jim Lottsfeldt, the Committee's Treasurer, regarding the Amended 2014 12 Day Pre-Primary Report. The Analyst informed Mr. Lottsfeldt that the increase in activity on the Amended 2014 12 Day Pre-Primary Report could be referred for further Commission action. Mr. Lottsfeldt explained that the increase was due to the oversight of a contribution that was received during the coverage period for the 2014 12 Day Pre-Primary Report, but that was not disclosed on the original report. The Analyst acknowledged that the Committee's response to the RFAI sent on March 29, 2015 was received and advised that an additional Form 99 could be filed to further clarify the issue on the public record if they wished to do so. Mr. Lottsfeldt said that he would consult with the Committee's counsel to determine whether any additional information could be provided (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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O-Index (2015-2016)

Cmte. ID: C00544346 Cmte. Name: PUT ALASKA FIRST

Treasurer Name: LOTTSEFELDT, JIM  
Address: PO BOX 92021, ANCHORAGE AK 99509-2021

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)  
Cmte. Designation: U (UNAUTHORIZED)  
Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Inng#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			1/6/2015	1	15950007070										
MS-T			4/28/2015	1	15951231722										
MS-T			4/28/2015	1	15951231723										
Totals										\$0		\$0			

O-Index (2013-2014)

Cmte. Name: PUT ALASKA FIRST

Treasurer Name: LOTTSELDT, JIM Address: PO BOX 92021, ANCHORAGE, AK 99509-2021

Comte, Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte, Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form	Ip	Rpt	Ip	All	Recpt	Dt	Pgs	Begin	Img#	Beg	Cvg	Dt	End	Cvg	Dt	Ltr	Mall	Dt	Begin	Cash	Repts	Disb	End	Cash	Debits	Loans	Debts & Loans
MS-T					11/1/2014		1	14952577823																			
RQ2	48				5/12/2014		3	14330052056					5/12/2014														
RQ2	48				5/9/2014		3	14330051762					5/9/2014														
RQ7	MY				8/22/2013		2	13330037610		5/2/2013			6/30/2013														
RQ2	Q2	N			10/8/2014		4	14330062040		4/1/2014			6/30/2014														
RQ2	12P	A			3/29/2015		2	15330079477		7/1/2014			7/30/2014														
RQ2	12P	N			12/10/2014		2	14330087520		7/1/2014			7/30/2014														
RQ2	12G	N			3/29/2015		2	15330079492		10/1/2014			10/15/2014														
F3X	MY	N			9/25/2013		7	13031120443		5/2/2013			6/30/2013							\$0	\$0			\$0	\$0		
F3XN	YE	N			1/30/2014		23	14960302612		7/1/2013			12/31/2013							\$0	\$287,500			\$279,926	\$7,573	\$0	\$0
F3XN	Q1	N			4/2/2014		15	14960602602		1/1/2014			3/31/2014							\$7,573	\$503,000			\$497,521	\$13,051	\$0	\$0
F3XN	Q2	N			7/14/2014		28	14961572088		4/1/2014			6/30/2014							\$13,051	\$3,647,539			\$3,655,426	\$5,165	\$0	\$0
F3XA	Q2	A			1/6/2015		29	15970002131		4/1/2014			6/30/2014							\$13,051	\$3,647,539			\$3,658,256	\$2,335	\$0	\$0
F3XN	12P	N			8/8/2014		13	14950002413		7/1/2014			7/30/2014							\$5,165	\$667,500			\$711,065	\$38,398	\$0	\$0
F3XA	12P	A			1/26/2015		16	15970048546		7/1/2014			7/30/2014							\$2,335	\$1,107,500			\$681,246	\$428,588	\$29,818	\$29,818
F3XN	Q3	N			10/14/2014		40	14978206182		8/1/2014			9/30/2014							\$401,800	\$2,495,800			\$2,803,241	\$94,158	\$0	\$0
F3XA	12G	A			10/21/2014		22	149570048562		7/31/2014			9/30/2014							\$428,588	\$2,495,800			\$2,803,241	\$121,147	\$29,818	\$29,818
F3XA	12G	A			5/20/2015		24	15971077886		10/1/2014			10/15/2014							\$94,158	\$1,184,500			\$1,074,816	\$203,841	\$29,818	\$29,818
F3XA	12G	A			5/27/2015		25	15951443308		10/1/2014			10/15/2014							\$121,147	\$1,184,500			\$1,074,816	\$230,830	\$29,818	\$29,818
F3XN	30G	N			12/3/2014		25	14952743158		10/16/2014			11/24/2014							\$203,841	\$1,328,000			\$1,444,187	\$87,553	\$0	\$0
F3XA	30G	A			5/20/2015		27	15953411700		10/16/2014			11/24/2014							\$203,841	\$1,328,000			\$1,443,415	\$68,426	\$29,818	\$29,818
F3XA	30G	A			5/27/2015		27	15951444333		10/16/2014			11/24/2014							\$230,830	\$1,328,000			\$1,443,415	\$115,415	\$29,818	\$29,818
F3XN	YE	N			1/28/2015		11	15970065815		1/25/2014			12/31/2014							\$87,653	\$0			\$75,961	\$11,692	\$0	\$0
F3XA	YE	A			5/20/2015		12	15951412874		1/25/2014			12/31/2014							\$87,653	\$0			\$75,961	\$11,692	\$0	\$0
F3XA	YE	A			5/27/2015		12	15971087057		1/25/2014			12/31/2014							\$115,415	\$0			\$75,961	\$39,453	\$0	\$0
F1		N			5/22/2013		6	13031064303																			
F1A		A			3/25/2014		4	14960559374																			
F24N	48				3/28/2014		1	14960567244																			
F24N	48				3/21/2014		1	14980556291																			
F24N	48				4/1/2014		1	14960651787																			
F24N	48				5/22/2014		1	14941250241																			
F24N	48				5/16/2014		1	14980803754																			



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## O-Index (2011-2012)

Cmte. ID: C00544346	Cmte. Name: PUT ALASKA FIRST
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Treasurer Name: LOTTSFELDT, JIM  
Address: PO BOX 92021, ANCHORAGE, AK 99509-2021

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)	Cmte. Designation: U (UNAUTHORIZED)	Filing Frequency: QUARTERLY FILER

[illegible]

**No records were found for this cycle.**

**Put Alaska First (C00544346)**

**2014 12 Day Pre-Primary Report/Amended 2014 12 Day Pre-Primary Report**

**Additional Receipts by Line Number**

Report Line	2014 12 Day Pre-Primary Report (Image 14950002415)	Amended 2014 12 Day Pre-Primary Report, received 1/26/15 (Image 15970048548)	Variance Amount
Line 11(c): Contributions from Other Political Committees	\$667,500.00	\$1,107,500.00	\$440,000.00
Total Variance			\$440,000.00